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Comments to RM-11305

I do not support RM-11305

I agree with the premise of the petitioners that the amateur radio regulations need to be amended to allow new forms of communications protocols to be used by amateurs. However, the approach in this petition will cause disarray when narrow modes (CW) are potentially forced to use the same spectrum as wideband modes (SSB). This petition requests that the only means of bandwidth restraint is by the class of the operator, without any regulatory requirements to enforce bandwidth limitations.

The petitioners suggest that the phone bands are very crowded and provide some supporting measured data. Unfortunately, the supporting measured data is of such limited scope that a reasonable conclusion cannot be reached. There is only one 12 hour period in the monitoring data, is only provided for bands selected by the author, is limited to a subjective determination of when a conversation is in progress, and is limited to a single location in the United States. The limitation of the monitoring to bands that support conversations with Europe limits the usefulness of the data; strictly domestic or other worldwide target areas are not included. The data was taken on a weekend day in the summer; a 12 hour period was chosen, ignoring the remainder of the day, and the Solar Flux number was 97 with an A index of 15, which is not indicative of "good" propagation conditions, or of occupancy throughout the entire solar cycle.

The petitioners have a valid point regarding automatic and semi-automatic operations in that the users will have a challenge of avoiding interference to other communications. I believe that there must be limits on the automatic and semi-automatic systems operations by the FCC regulations or the unattended systems will become so prevalent that the "normal" amateur operator will not be able to find spectrum to operate.

Limitations must be placed on the automatic and semi-automatic operations and I suggest that there be a 10 kHz sub-band made available in each HF amateur band for those operations. Outside of those 10 kHz sub-bands, all operations must have a control operator present.

The petitioners appear to be developing a case for "phone band" expansion to any frequency allowed by the control operator's license. I believe that an expansion of the "phone band" is necessary, but not at the expense of all other modes of amateur operations.